

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: Terrorist Attacks on September 11, 2001	03-me-1570 (GBD)(SN) ECF Case
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This document relates to:

Burnett, et al., v. The Islamic Republic of Iran, et al.: No. 15-cv-9903 (GBD)(SN)

DECLARATION OF JUSTIN BENITEZ

I, JUSTIN BENITEZ, hereby declare under penalty of perjury as follows:

1. I am currently 24 years of age and reside in Freeport, New York.
2. I am the stepson of James Pappageorge who was killed in the September 11, 2001 terrorist attacks at the World Trade Center in New York where he was responding to the attacks as a firefighter with the Fire Department of New York.
3. James Pappageorge was present during my birth at Mt. Sinai Hospital in Manhattan on August 30, 1995. At the time, James and my mother had been dating each other for several years.
4. I began residing with James sometime in 1997 when he and my mother began cohabitating, and continuously did so until the day he died on September 11, 2001.
5. My biological father was not present in my life and played no role in raising me. My biological father did not provide financial, emotional, spiritual, or any other kind of support to me as I was growing up.
6. James Pappageorge was the father in my life. He provided financial, emotional and spiritual support to me from the day I was born until the day he died on September 11, 2001. He clothed me, fed me, provided a home and kept me safe. James taught me right from wrong.
7. When I was a baby, James often changed my diapers; he helped prepare my food and often fed it to me. He read me bedtime stories as I would fall asleep at night. As I grew a little older, James helped teach me to walk and to talk. When I grew a little older still, James began teaching me to read and was helping me learn the alphabet, how to count numbers and the

names of colors, animals and shapes. He would often dress me and was teaching me how to tie my shoelaces when he was killed.

8. When I began attending preschool at 2 years of age, James would take me and pick me up as his schedule allowed. He did the same when I began kindergarten at age 5. As we were making our way to or from school, James would instruct me on how I was expected to act in the classroom; just as important, he would also instruct me how not to act. He would point out bad behavior happening around us and explain to me why such behavior was not acceptable. As an adult, I realize how these little talks with James as we walked along to and from school have influenced my life.

9. James was very strict about the foods he would eat. However, oftentimes on Saturday mornings, he would pour himself a bowl of Waffle Crisp cereal and sit down to watch cartoons with me because he knew it was my favorite breakfast food. As an adult, I know James would never have eaten Waffle Crisp cereal but for wanting to prove his love for me.

10. James would often take me along with him to the market to buy the healthier foods he ate, and I would often accompany him to the GNC (General Nutrition Center) store where he would buy vitamins and nutritional supplements. During these trips, James always stressed the importance of a proper nutrition, not just for kids like me but for adult firefighters like him too.

11. While James was attending the Fire Academy of the New York Fire Department, my mother and I attended the Firefighter Field Day where James introduced us to his fellow firefighters as his family.

12. Not long before he was killed, James bought me an inflatable swimming pool that he would set up in my grandmother's (his mother's) backyard for when we would visit with her. I fondly recall James and I "going swimming" in the pool together although James would barely fit. I never felt more love and happiness than when I was swimming in my pool with my father, James.

13. Every man can be a dad, but not every man can be a father. James Pappageorge was my father in all ways and I am the man I am today because of him.

14. The terrorist attacks on 9/11 took away my father and my life will never be the same.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12/04/19


Justin Benitez